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To: Stephen Tzhone/R6/USEPA/US@EPA, Garyg Miller/R6/USEPA/US@EPA
Date: 06/23/2011 04:51 PM
Subject: TCEQ comments on the Draft Addendum 2

Gary, Stephen,
Please see attached the TCEQ Toxicology Division Comments on the Draft Addendum 2, SAP for Residential Soil Sampling.
If any questions, please contact me or Tracy Phillips.

Thanks!

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e-mail: luda.voskov@tceq.texas.gov SJWP Draft Addendum 2 to the Soil SAP.pdf

TCEQ Interoffice Memorandum

To: Luda Voskov
Superfund Section
Remediation Division

From: Tracie Phillips, Ph.D. *TP*
Toxicology Division, Chief Engineer's Office

Date: June 23, 2011

Subject: Toxicology Division Comments on the Draft Addendum 2 to the Soil Sampling and Analysis Plan (SAP) for Residential Soil Sampling, San Jacinto River Waste Pits Federal Superfund Site, Harris County, Texas.

Staff of the Toxicology Division (TD) reviewed the Draft Addendum 2 to the Soil Sampling and Analysis Plan (hereafter referred to as Draft Addendum) for Residential Soil Sampling (dated June 2011) for the San Jacinto River Waste Pits Federal Superfund Site located in Harris County, Texas. The Draft Addendum was prepared by Integral Consulting Inc. and Anchor QEA, LLC. To the extent possible, TD reviewed the Draft Addendum to ensure compliance with the Texas Risk Reduction Program (TRRP) rule (30 TAC §350). TD's review focused on portions of the document dealing with human health risks and hazards associated with potential exposure to site-related contaminants. Other issues discussed in the document were not reviewed. The section headings below correspond to those contained in the Draft Addendum and are followed by TD comments.

Analytical Approach

This section indicates that only the 17 toxic dioxin and furan congeners will be analyzed for, as stipulated by EPA; the 12 dioxin-like PCBs were not included. As previously commented on in the Draft Sediment SAP and Draft RIFS Work Plan, the EPA September 2009 draft *Recommended Toxicity Equivalency Factors (TEFs) for Human Health Risk Assessments of Dioxin and Dioxin-Like Compounds* recommends the use of the consensus TEF values for 2,3,7,8-tetrachlorodibenzo-p-dioxin and dioxin-like compounds, including polychlorinated dibenzo-p-dioxins (PCDDs), polychlorinated dibenzofurans (PCDFs), and polychlorinated biphenyls (PCBs), published in 2005 by the World Health Organization (WHO). TRRP 30 TAC §350.76(d)(2)(B) indicates the TEFs to be used for dioxin-like compounds, which also includes dioxin-like PCBs. Although TRRP has not yet been revised to include the 2005 WHO TEFs, it is recommended that those TEFs be considered when calculating a TEQ, especially if they result in a higher TEQ.

Also, this section indicates that the residential soils will be compared with the reference envelope value calculated on the basis of a site-specific background area. As previously commented on in the Draft Soil SAP and Draft Tissue SAP, it is critically important to make sure that background is appropriately characterized. A true background mean needs to be determined, which is a background that is unaffected by the site contamination. It is also important to note that in the TRRP Rule 1 ppb and 5 ppb are the dioxin cleanup values for residential and commercial/industrial soil, respectively. The TD defers to the Technical Support Section Staff, who have expertise in this area, to make sure the background calculations are appropriate.

Sample Locations and Depth

This section indicates that four aliquots will be collected from each sampled residence, which will then be composited into a single sample per sampled residence. Consideration should be given to the identification of potential hot spots in the residential samples.

This section also indicates that only the composite of soils collected from 0 to 6 inches will be analyzed and the rest will be archived. No explanation of reasoning was offered for this decision, please provide an explanation. Also, be aware under §350.4(a)(88) of TRRP, if necessary (i.e., exceedances of TRRP PCLs are encountered), residential soils will need to be assessed down to a depth of 15 feet below ground surface.

If you have any questions about this evaluation, please contact me at (512) 239-2269 or tracie.phillips@tceq.texas.gov.

cc: Toxicology Division (via e-mail), Board, Remediation File